



U.S. Department of Justice

Antitrust Division

Liberty Square Building

*450 5th Street, N.W.
Washington, DC 20001*

August 5, 2022

VIA EMAIL

The Honorable R. Barclay Surrick
United States District Judge
Eastern District of Pennsylvania
601 Market Street
Philadelphia, PA 19106

Re: *United States v. Ara Aprahamian*, 20-cr-64 (RBS)

Dear Judge Surrick:

In advance of next Tuesday's Status Hearing, counsel for the United States conferred with counsel for Defendant Ara Aprahamian regarding a potential trial date. The parties were unable to agree on a trial date or proposed pretrial schedule. The United States stands ready to try this case and proposes a January 2023 trial date—nearly three years after Defendant was indicted. Defendant's counsel indicated to the United States that the earliest date by which they would be prepared to try the case is March 2024, contingent on receiving additional discovery material.¹ The United States proposes the following schedule:

		United States' Proposal	Defendant's Proposal
All Pretrial Motions Except Motions in Limine	Opening Motions	September 26, 2022 (Mon.)	
	Responses	October 31, 2022 (Mon.)	
	Replies	November 14, 2022 (Mon.)	
Expert Disclosures		December 16, 2022 (Fri.)	
Exhibit List		December 16, 2022 (Fri.)	
Motions in Limine	Opening Motions	January 2, 2023 (Mon.)	
	Responses	January 16, 2023 (Mon.)	
Proposed Jury Instructions		January 2, 2023 (Mon.)	
Objections to Exhibit List		January 9, 2023 (Mon.)	
Witness List		January 9, 2023 (Mon.)	
Objections to Jury Instructions		January 16, 2023 (Mon.)	
Proposed Voir Dire Questions		January 16, 2023 (Mon.)	
Proposed Verdict Sheets		January 16, 2023 (Mon.)	
Trial Date		January 23, 2023 (Mon.)	March 2024

¹ The United States believes that most of the additional discovery material requested by Defendant is not discoverable.

The United States recognizes the continued threat that the COVID-19 pandemic may present and submits that any associated modifications to the Court's trial calendar could be best addressed by later modification to the trial date if circumstances require. The scheduling order the United States has proposed will best position the Court and the parties to prepare for trial as expeditiously as possible under the circumstances and is in the interests of justice.

Sincerely yours,

/s/ Kevin Hart
Kevin B. Hart
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